

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10 - _____</u>
v.	:	DATE FILED: September 8, 2010
ZACHARY YOUNG	:	VIOLATIONS:
ANGEL ORTIZ,	:	21 U.S.C. § 846
 a/k/a “Fatboy,”	:	(conspiracy to distribute 100 grams
MIGUEL SANTIAGO	:	or more of heroin - 1 count)
ROBERT SNYDER	:	21 U.S.C. § 841(a)(1)
CHRISTAL SNYDER	:	(distribution of heroin - 5 counts)
MARK WILLIAMS	:	21 U.S.C. § 860 (possession with intent to
JAMES VENZIALE	:	distribute 100 grams or more of heroin
MARCUS BRANKER	:	within 1,000 feet of a school - 1 count)
	:	21 U.S.C. § 843(b)
	:	(use of a communication facility in
	:	furtherance of a drug trafficking
	:	crime -8 counts)
	:	18 U.S.C. § 1951(a)
	:	(conspiracy to commit robbery which
	:	interferes with interstate commerce - 1
	:	count)
	:	18 U.S.C. § 1951(a)
	:	(attempted robbery which interferes with
	:	interstate commerce - 1 count)
	:	18 U.S.C. § 924(c)(1)
	:	(using and carrying a firearm during and
	:	in relation to a crime of violence - 1
	:	count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about April 2010, through on or about July 7, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ZACHARY YOUNG,
ANGEL ORTIZ,
a/k/a “Fatboy,”
ROBERT SNYDER,
CHRISTAL SNYDER,
MARK WILLIAMS, and
JAMES VENZIALE**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 100 grams or more, that is, in excess of 500 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendants ZACHARY YOUNG and ANGEL ORTIZ distributed resale quantities of heroin in Philadelphia, Pennsylvania to individuals known and unknown to the grand jury, including to a Special Agent with the Drug Enforcement Administration acting in an undercover capacity, who is referred to here as the “UC.”

3. Defendants ZACHARY YOUNG and ANGEL ORTIZ were supplied with heroin by, among others, Miguel Santiago, charged elsewhere in this superseding indictment.

4. Defendants ROBERT SNYDER, MARK WILLIAMS, and JAMES VENZIALE were Philadelphia Police Officers. Defendant SNYDER was assigned to the 25th Police District and defendants WILLIAMS and VENZIALE were assigned to the 39th Police District.

5. Defendants ROBERT SNYDER, MARK WILLIAMS, and JAMES VENZIALE participated in this conspiracy by abusing their authority as police officers to assist defendants ZACHARY YOUNG and ANGEL ORTIZ in a scheme to steal 300 grams of heroin from Miguel Santiago. In particular, after defendants SNYDER, WILLIAMS, VENZIALE, YOUNG, and ORTIZ discussed various options to steal the 300 grams of heroin, defendants WILLIAMS and VENZIALE conducted a vehicle stop of defendant ORTIZ and the UC while defendant ORTIZ possessed the 300 grams of heroin supplied by Santiago. During this vehicle stop, Santiago's courier, who had just delivered the heroin to defendant ORTIZ, was nearby watching. To make Santiago believe that the 300 grams of heroin he had supplied to defendant ORTIZ was legitimately seized by Philadelphia police officers, defendants WILLIAMS and VENZIALE made it appear as if they were arresting defendant ORTIZ by handcuffing him outside the UC's vehicle.

6. Defendant CHRISTAL SNYDER, the wife of defendant ROBERT SNYDER, facilitated the objects of the conspiracy by passing information between defendant ANGEL ORTIZ and defendants ROBERT SNYDER, MARK WILLIAMS, and JAMES VENZIALE.

7. Defendants ZACHARY YOUNG, ANGEL ORTIZ, ROBERT SNYDER, MARK WILLIAMS, JAMES VENZIALE, and CHRISTAL SNYDER believed that the heroin that would be obtained as a result of their involvement in the conspiracy would be provided to the UC for further distribution by the UC, whom each of the defendants believed to be a drug dealer and money launderer. Defendants YOUNG, ORTIZ, ROBERT SNYDER, WILLIAMS,

VENZIALE, and CHRISTAL SNYDER all expected to receive payments from the sale of the heroin.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, defendants ANGEL ORTIZ, ZACHARY YOUNG, ROBERT SNYDER, CHRISTAL SNYDER, MARK WILLIAMS, and JAMES VENZIALE, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about April 5, 2010, defendant ZACHARY YOUNG distributed two “samples” of heroin to the UC, which weighed approximately .27 grams and .11 grams respectively.

2. On or about April 7, 2010, Miguel Santiago distributed 97.9 grams of heroin to defendants ZACHARY YOUNG and ANGEL ORTIZ, which defendants YOUNG and ORTIZ subsequently distributed to the UC in exchange for approximately \$8,000 in United States currency.

3. On or about April 19, 2010, defendants ZACHARY YOUNG and ANGEL ORTIZ distributed a “sample” of heroin to the UC, which weighed approximately .12 grams. Defendants YOUNG and ORTIZ also discussed with the UC a plan to steal, with the unlawful assistance of Philadelphia police officers, 300 grams of heroin from their supplier, Miguel Santiago.

4. On or about April 20, 2010, defendants ANGEL ORTIZ and JAMES VENZIALE met in the area of West Somerset Street and West Glenwood Avenue in

Philadelphia, where they discussed a plan to steal, with the unlawful assistance of Philadelphia police officers, 300 grams of heroin from Miguel Santiago and, ultimately, to redistribute that heroin to the UC.

5. On or about April 21, 2010, defendants ZACHARY YOUNG, ANGEL ORTIZ, and MARK WILLIAMS met in the area of West Somerset Street and West Glenwood Avenue, in Philadelphia, where defendants ORTIZ and WILLIAMS discussed a plan to steal, with the unlawful assistance of Philadelphia police officers, 300 grams of heroin from Miguel Santiago.

6. On or about April 28, 2010, Miguel Santiago supplied defendant ANGEL ORTIZ with approximately 98.2 grams of heroin, which defendant ORTIZ distributed to the UC, in the presence of Miguel Santiago, in exchange for approximately \$7,000 in United States currency.

7. On or about April 29, 2010, defendants ANGEL ORTIZ and ROBERT SNYDER met in the area of Welsh Avenue and Rowland Avenue, in Philadelphia, to discuss a plan to steal, with the unlawful assistance of Philadelphia police officers, 300 grams of heroin from Miguel Santiago.

8. On or about May 3, 2010, defendant ANGEL ORTIZ distributed a “sample” of heroin, weighing approximately .50 grams, to the UC.

9. On or about May 4, 2010:

a. Defendants ANGEL ORTIZ and MARK WILLIAMS met with the UC in the area of Broad Street and Westmoreland Avenue in Philadelphia, where they discussed a plan to steal, with the unlawful assistance of Philadelphia police officers, 300 grams of heroin from Santiago.

b. At the conclusion of the meeting, defendant MARK WILLIAMS surreptitiously obtained the license number of the UC's vehicle.

c. Later that same day, defendant MARK WILLIAMS, while on duty as a Philadelphia police officer, improperly accessed a police computer in an attempt to determine to whom the UC's car was registered.

10. On or about May 5, 2010, Miguel Santiago supplied defendant ANGEL ORTIZ with approximately 194.3 grams of heroin, which defendant ORTIZ distributed to the UC in exchange for approximately \$14,000 in United States currency.

11. On or about May 7, 2010, defendants CHRISTAL SNYDER, ROBERT SNYDER, and ANGEL ORTIZ spoke on phones and discussed the details of the plan to steal, with the unlawful assistance of Philadelphia police officers, 300 grams of heroin from Miguel Santiago, by having defendants MARK WILLIAMS and JAMES VENZIALE perform an illegal and staged police vehicle stop to make it appear to Miguel Santiago that the drugs were seized by Philadelphia police. The telephone calls included a discussion about the payment that the defendants, including defendants WILLIAMS and VENZIALE, would receive.

12. On or about May 10, 2010, defendants CHRISTAL SNYDER, ANGEL ORTIZ, and ZACHARY YOUNG spoke on phones and discussed the details of the plan to steal approximately 300 grams of heroin. During one of the conversations, at defendant CHRISTAL

SNYDER'S request, and because of concerns by defendants MARK WILLIAMS, JAMES VENZIALE, and ROBERT SNYDER that the UC could be an undercover law enforcement officer, defendant ORTIZ provided defendant CHRISTAL SNYDER with the name of the UC, so that defendants WILLIAMS, VENZIALE, and ROBERT SNYDER could confirm his identity.

13. On or about May 11, 2010 defendant ANGEL ORTIZ distributed two "samples" of heroin, weighing approximately .34 grams and .30 grams, to the UC. Defendant ORTIZ told the UC that one sample was from Santiago and the other was from another heroin supplier.

14. On or about May 13, 2010:

a. At the request of defendants ROBERT SNYDER and CHRISTAL SNYDER, defendant ANGEL ORTIZ obtained the UC's driver's license from the UC.

b. Defendant ANGEL ORTIZ subsequently showed it to defendant CHRISTAL SNYDER, who then provided the information from the UC's driver's license to defendant ROBERT SNYDER.

c. Later that day, at approximately 8:00 p.m., defendant ROBERT SNYDER, while on duty at the 25th police district, improperly ran a police computer check on the UC's identity.

15. On or about May 13, 2010, defendant ANGEL ORTIZ distributed approximately 45.9 grams of heroin to the UC in exchange for approximately \$3,500 in United States currency.

16. On or about May 14, 2010:

a. Defendants ANGEL ORTIZ, MARK WILLIAMS, and JAMES VENZIALE met in the area of Hunting Park Avenue and Broad Street in Philadelphia to discuss the final details of the plan to acquire approximately 300 grams of heroin by having defendants WILLIAMS and VENZIALE, while on duty, perform a staged vehicle stop to make it appear to Miguel Santiago, the supplier of the heroin, that the drugs were seized by law enforcement, so that the defendants could avoid paying Santiago for the heroin.

b. Miguel Santiago delivered approximately 299 grams of heroin to defendant ANGEL ORTIZ, and defendant ORTIZ delivered that heroin to the UC, all in return for a promised payment to Santiago.

c. While defendants MARK WILLIAMS and JAMES VENZIALE were on duty and in their Philadelphia Police Department uniforms, they conducted an illegal traffic stop of the vehicle driven by the UC and occupied by defendant ANGEL ORTIZ. Defendants WILLIAMS and VENZIALE placed handcuffs on defendant ORTIZ and put him in the back of their marked Philadelphia Police Department car, but permitted the UC to drive away from the location while still in possession of approximately 299 grams of heroin. Defendants WILLIAMS and VENZIALE then drove defendant ORTIZ to Broad and Lehigh Streets in Philadelphia and released him from their police vehicle.

d. Defendants ANGEL ORTIZ and ZACHARY YOUNG subsequently spoke by phone to confirm their belief that the plan to steal the heroin from Miguel Santiago was successful.

e. Defendant ANGEL ORTIZ met with defendants MARK WILLIAMS and JAMES VENZIALE in the area of Hunting Park Avenue and Broad Street,

where defendant ORTIZ paid defendants WILLIAMS and VENZIALE approximately \$6,000 in United States currency.

f. Defendant ANGEL ORTIZ subsequently met with defendant CHRISTAL SNYDER in the area of Memphis Street and York Street in Philadelphia, where defendant ORTIZ paid defendant CHRISTAL SNYDER an unknown amount of United States currency.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 7, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MIGUEL SANTIAGO,
ZACHARY YOUNG, and
ANGEL ORTIZ,
a/k/a Fatboy,**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 28, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MIGUEL SANTIAGO and
ANGEL ORTIZ,
a/k/a Fatboy,**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**MIGUEL SANTIAGO and
ANGEL ORTIZ,
a/k/a Fatboy,**

knowingly and intentionally distributed, and aided and abetted the distribution of, 100 grams or more, that is, approximately 194.3 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 13, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANGEL ORTIZ,
a/k/a Fatboy,**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 7 and each of the following Overt Acts in Count One

of this superseding indictment are incorporated here: 3 through 5, 7, 9, 11, 12, 14, and 16.

2. On or about May 14, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ZACHARY YOUNG,
ANGEL ORTIZ,
a/k/a "Fatboy,"
MIGUEL SANTIAGO,
MARK WILLIAMS,
JAMES VENZIALE,
ROBERT SNYDER, and
CHRISTAL SNYDER**

knowingly and intentionally distributed, and aided and abetted the distribution of, 100 grams or more, that is, approximately 299 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 7 and each of the following Overt Acts in Count One

of this superseding indictment are incorporated here: 3 through 5, 7, 9, 11, 12, 14, and 16.

2. On or about May 14, 2010, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**ZACHARY YOUNG,
ANGEL ORTIZ,
a/k/a "Fatboy,"
MIGUEL SANTIAGO,
MARK WILLIAMS,
JAMES VENZIALE,
ROBERT SNYDER, and
CHRISTAL SNYDER**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 100 grams or more, that is, approximately 299 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1000 feet of the real property comprising KIPP Philadelphia Charter School, a middle school, located at 2709 North Broad Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
CHRISTAL SNYDER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendants ORTIZ and SNYDER used the telephone to arrange a meeting to discuss the plan to seize heroin from Miguel Santiago.

In violation of Title 21, United States Code, Section 843(b).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 4, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
CHRISTAL SNYDER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendants ORTIZ and SNYDER used the telephone to arrange a meeting to discuss the plan to seize heroin from Miguel Santiago.

In violation of Title 21, United States Code, Section 843(b).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 7, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
CHRISTAL SNYDER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendants ORTIZ and SNYDER used the telephone to discuss the amount of payment that coconspirators would receive for their participation in the plan to seize 300 grams of heroin from Miguel Santiago.

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 10, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
CHRISTAL SNYDER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendant ORTIZ provided defendant CHRISTAL SNYDER with the UC's name, so that Robert Snyder, Mark Williams, and James Venziale, charged elsewhere in this superseding indictment, could determine whether the UC was not an undercover law enforcement officer.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 13, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
ROBERT SNYDER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendant ORTIZ and defendant ROBERT SNYDER discussed the plan to seize heroin from Miguel Santiago.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 13, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
CHRISTAL SNYDER**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendant CHRISTAL SNYDER informed defendant ORTIZ that UC's identity had been verified and that the plan to seize heroin from Miguel Santiago could take place on May 14, 2010.

In violation of Title 21, United States Code, Section 843(b).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 14, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
ZACHARY YOUNG**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendant ORTIZ informed defendant YOUNG that the plan to steal 300 grams of heroin from Miguel Santiago had been successfully completed.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 14, 2010, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy," and
MARK WILLIAMS**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute heroin, described in Count One of this superseding indictment, in violation of Title 21 United States Code, Section 846, in that defendants ORTIZ and WILLIAMS used the telephone to arrange a meeting so that defendants WILLIAMS and VENZIALE could be paid \$6,000 in cash in United States currency for having conducted the staged traffic stop.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 and 4 of this Count One of this superseding indictment are incorporated here.
2. From at least, on or about June 10, 2010, through at least on or about July 9, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a “Fatboy,”
ROBERT SNYDER,
CHRISTAL SNYDER,
MARK WILLIAMS, and
MARCUS BRANKER**

conspired and agreed, together and with others known and unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, in that defendants ANGEL ORTIZ, ROBERT SNYDER, CHRISTAL SNYDER, MARK WILLIAMS , and MARCUS BRANKER conspired to unlawfully take and obtain U.S. currency from the person and in the presence of another against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3) .

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendant ANGEL ORTIZ was introduced to a person who he believed was a member of the “Mafia,” who was, in actuality, a Special Agent with the Federal Bureau of Investigation acting in an undercover capacity (hereafter UC-2). Defendant ORTIZ believed that UC-2 routinely collected gambling money from individuals in Pennsylvania and New Jersey, and

then delivered the gambling proceeds to the UC to launder by making deposits into various banks in New Jersey.

4. Defendants ROBERT SNYDER and MARK WILLIAMS were Philadelphia Police officers. Defendant SNYDER was assigned to the 25th Police District and defendant WILLIAMS was assigned to the 39th Police District.

5. Defendant ROBERT SNYDER and MARK WILLIAMS participated in this conspiracy by abusing their authority as police officers to assist defendant ANGEL ORTIZ in a scheme to rob United States currency from UC-2. In particular, a scheme was developed whereby defendant WILLIAMS would conduct a vehicle stop of defendant ORTIZ, UC, and UC-2, while defendant ORTIZ was in possession of the United States currency. To make UC -2 believe that the money had been legitimately seized by Philadelphia police officers, defendant WILLIAMS, after finding defendant ORTIZ in possession of a controlled substance, would make it appear as if he was arresting ORTIZ by handcuffing him outside of UC -2's vehicle. To further ensure that UC-2 believed that the seizure of the United States currency was legitimate police activity, defendant WILLIAMS provided defendant ORTIZ and UC with a blank Philadelphia Police Department property receipt and instructed them how to properly fill it out.

6. Defendant Christal SNYDER, the wife of defendant ROBERT SNYDER, facilitated the conspiracy by passing information between defendant ANGEL ORTIZ and defendants ROBERT SNYDER and MARK WILLIAMS.

7. Defendant MARCUS BRANKER drove a Black Chevrolet Trailblazer, equipped with strobe lights, to the location where the sham traffic stop was to occur for the purpose of posing as an undercover police officer assisting defendant WILLIAMS with the vehicle stop.

8. Defendants ROBERT SNYDER, CHRISTAL SNYDER, MARK WILLIAMS and MARCUS BRANKER all expected to receive a portion of the United States currency stolen from the UC-2.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, defendants ANGEL ORTIZ, ROBERT SNYDER, CHRISTAL SNYDER, MARK WILLIAMS, and MARCUS BRANKER, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about June 10, 2010:

a. Defendant ANGEL ORTIZ and CHRISTAL SNYDER met with the UC in the area of 8742 Marsden Street in Philadelphia, where they discussed a plan to rob UC -2 of United States currency with the unlawful assistance of Philadelphia police officers.

b. At the conclusion of the meeting, defendant CHRISTAL SNYDER contacted her husband, defendant ROBERT SNYDER, and provided him with the details of the plan including what payment would be received.

c. Later that evening, defendant ROBERT SNYDER, while on duty at the Philadelphia Police Department's 25th Police District, improperly ran a police computer check to determine the UC's identity.

2. On or about June 16, 2010, defendant ROBERT SNYDER contacted CHRISTAL SNYDER to inform her that defendant MARK WILLIAMS was willing to participate in the robbery of UC-2 and that defendant WILLIAMS was willing to provide defendant ANGEL ORTIZ with a Philadelphia Police Department property receipt.

3. On or about June 17, 2010, defendants ANGEL ORTIZ and MARK WILLIAMS met with the UC in the area of Large Street and Roosevelt Boulevard in Philadelphia to discuss the details of the plan to rob UC-2 of United States currency by having defendant WILLIAMS, while on duty, perform a staged vehicle stop to make it appear to UC-2 that the United States currency was seized by law enforcement.

4. On or about June 21, 2010, defendants ANGEL ORTIZ and MARK WILLIAMS met with the UC in the area of Adams Avenue and Roosevelt Boulevard in Philadelphia, where they discussed the details of the plan to rob UC-2. During the meeting, defendant WILLIAMS provided defendant ORTIZ and UC with several copies of a Philadelphia Police Department property receipt and provided instructions on how to properly fill it out.

5. On or about June 22, 2010:

a. Defendants ANGEL ORTIZ and MARK WILLIAMS met with the UC in the area of Hunting Park Avenue and Broad Street in Philadelphia to discuss the details of the plan to rob UC-2.

b. Later that day, Defendant MARK WILLIAMS drove his marked police vehicle to the area of Rush Street in Philadelphia to await a call from defendant ANGEL ORTIZ that the UC-2 had arrived and that he, the defendant WILLIAMS, could conduct the vehicle stop.

c. While awaiting the arrival of the UC -2, defendant ANGEL ORTIZ spoke with defendant CHRISTAL SNYDER, giving status reports about the progress of the anticipated robbery. Defendant CHRISTAL SNYDER then provided the information to defendant ROBERT SNYDER.

6. On or about June 25, 2010, defendant MARK WILLIAMS was placed on restricted duty by the Philadelphia Police Department. As a result, defendant WILLIAMS was not permitted to wear a police uniform, not permitted to carry a weapon on or off duty, and was not permitted to take any police action. Additionally, defendant WILLIAMS was required to, and did, turn in his police department issued firearm.

7. On or about July 2, 2010, defendants MARK WILLIAMS and ANGEL ORTIZ met to discuss defendant MARK WILLIAMS' restricted duty status. Later that day, defendant ANGEL ORTIZ advised defendant CHRISTAL SNYDER of defendant WILLIAMS' restricted duty status and arranged a meeting with ROBERT SNYDER on July 3, 2010.

8. On or about July 7, 2010, defendants ANGEL ORTIZ and MARK WILLIAMS met with the UC in the area of Large Street and Roosevelt Boulevard in Philadelphia, to discuss the plan to rob UC-2 of United States currency.

9. On or about July 9, 2010:

a. Defendant MARK WILLIAMS recruited defendant MARCUS BRANKER to assist in the scheduled robbery of UC-2. Specifically, defendant BRANKER, driving in a black Chevrolet Trailblazer equipped with emergency lights, was recruited to pretend to be an undercover police officer to assist defendant MARK WILLIAMS with the vehicle stop.

b. Defendant MARK WILLIAMS, while off duty and while on restricted duty, dressed in a Philadelphia Police Department uniform, armed himself with his personal firearm, and took, without authorization, a Philadelphia Police Department vehicle wagon from the 39th Police District.

c. Defendants MARK WILLIAMS, MARCUS BRANKER and ANGEL ORTIZ met with the UC in the area of 11th Street and Westmoreland Avenue in Philadelphia, to discuss the final details of the plan to rob UC-2 of United States currency by performing a staged vehicle stop to make it appear as if the United States currency was lawfully seized by law enforcement.

d. After the meeting, defendant MARK WILLIAMS, drove the marked Philadelphia Police Department vehicle, and defendant MARCUS BRANKER, drove the Chevrolet Trailblazer, to the area of Park Avenue and Somerset Street in Philadelphia, where they awaited a call from Defendant ANGEL ORTIZ that UC-2 had arrived.

All in violation of Title 18, United States Code, Sections 1951(a)

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 8, and Overt Acts 1 through 8 of Count Sixteen of this superseding indictment are incorporated here.

2. On or about July 9, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a “Fatboy,”
ROBERT SNYDER,
CHRISTAL SNYDER,
MARK WILLIAMS, and
MARCUS BRANKER**

attempted to commit robbery, which obstructed, delayed, and affected commerce, and the movements of articles and commodities in commerce, in that defendants ANGEL ORTIZ, ROBERT SNYDER, CHRISTAL SNYDER, MARK WILLIAMS, and MARCUS BRANKER attempted to unlawfully take and obtain, and aided and abetted the attempted unlawful taking of United States currency from UC-2, a person known to the grand jury, from the person or in the presence of UC-2 and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to UC-2, by conducting an illegal traffic stop of a vehicle occupied by UC-2 and unlawfully seizing United States currency.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 8, and Overt Acts 1 through 8 of Count Sixteen of this superseding indictment are incorporated here.

2. On or about July 9, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANGEL ORTIZ,
a/k/a “Fatboy,”
ROBERT SNYDER,
CHRISTAL SNYDER,
MARK WILLIAMS, and
MARCUS BRANKER**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a silver Kahr, 9 mm handgun, serial number YD3521, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to commit robbery which interfered with commerce, and attempted robbery which attempted to interfere with commerce, in violation of Title 18 United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924 (c)(1) and 2.

NOTICE OF FORFEITURE NO. 1

THE GRAND JURY FURTHER CHARGES THAT :

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846, set forth in this superseding indictment, defendants

**ZACHARY YOUNG,
ANGEL ORTIZ,
a/k/a "Fatboy,"
MIGUEL SANTIAGO,
ROBERT SNYDER,
CHRISTAL SNYDER,
MARK WILLIAMS, and
JAMES VENZIALE**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

3. As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendants

**ANGEL ORTIZ,
a/k/a "Fatboy,"
ROBERT SNYDER,
CHRISTAL SNYDER,
MARK WILLIAMS, and
MARCUS BRANKER**

shall forfeit to the United States of America, the firearm involved in the commission of this offense, including, but not limited to:

(1) a silver Kahr, 9 mm handgun, serial number YD3521.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney